

Exhibit 84

From: Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>
Sent: Monday, February 14, 2022 3:06 PM
To: Lesley Weaver; Matt Melamed; Anne Davis; Derek Loeser; Cari Laufenberg; Chris Springer; David Ko
Cc: Stein, Deborah L.; Lipshutz, Joshua S.; Ring, Rose; Davis, Colin B.; Mumm, Laura C.
Subject: In re FB: Plaintiffs' Rule 26 Disclosures

Facebook's request that Plaintiffs' further amend their Rule 26 disclosures.

1. With respect to Plaintiffs' claim for compensatory damages, will Plaintiffs amend their Amended Rule 26 disclosure by February 21 to disclose "a computation of each category of [compensatory] damages claimed . . . [and] the documents or other evidentiary material . . . on which each computation is based, including materials bearing on the nature of injuries suffered." Fed. R. Civ. P. 26(a)(1)(A)(iii).
2. With respect to Plaintiffs' claim for nominal damages, will Plaintiffs amend their Amended Rule 26 disclosure by February 21 to disclose "a computation of each category of [nominal] damages claimed . . . [and] the documents or other evidentiary material . . . on which each computation is based, including materials bearing on the nature of injuries suffered." Fed. R. Civ. P. 26(a)(1)(A)(iii).
3. With respect to Plaintiffs' claim for statutory damages, will Plaintiffs amend their Amended Rule 26 disclosure by February 21 to disclose "a computation of each category of [statutory] damages claimed . . . [and] the documents or other evidentiary material . . . on which each computation is based, including materials bearing on the nature of injuries suffered." Fed. R. Civ. P. 26(a)(1)(A)(iii).
4. With respect to Plaintiffs' claim for restitution, will Plaintiffs amend their Amended Rule 26 disclosure by February 21 to disclose "a computation of each category of [restitution] damages claimed . . . [and] the documents or other evidentiary material . . . on which each computation is based, including materials bearing on the nature of injuries suffered." Fed. R. Civ. P. 26(a)(1)(A)(iii).

Facebook is willing to table for the time being Plaintiffs' disclosure obligations with respect to their demand for unjust enrichment and/or disgorgement damages.

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